COMMUNITIES FOR A BETTER ENVIRONMENT

March 11, 2016

Ryan Hostetter, Project Manager
San Luis Obispo County
Department of Planning and Building
976 Osos Street
San Luis Obispo, CA 93408

VIA EMAIL
rhostetter@co.slo.ca.us

RE: Supplemental Comment on the Final Environmental Impact Report for the Phillips 66 Company Rail Spur Extension and Crude Unloading Project

Dear Ms. Hostetter,

Communities for a Better Environment submits the following supplemental comment in support of the Department of Planning and Building Staff's recommendation to deny the Phillips 66 Company Rail Spur Extension and Crude Unloading Project ("Project").

The Final Environmental Impact Report for the Project ("FEIR") fails to include an adequate analysis of the "three trains per week" alternative.   Among other things, the FEIR fails to include any discussion whatsoever of whether the proposed larger physical oil unloading capacity can be approved under this alternative or even whether this larger capacity could, in fact, eventually be used.

This error compounds the FEIR's existing shortcomings, in particular, the failure to disclose changes in the refinery crude slate that are enabled by the Project. This leaves several unaddressed, unmitigated, and significant air quality, climate, and catastrophic hazard impacts from refining greater quantities of a lower quality oil feedstock in Santa Maria. The FEIR also erroneously substitutes a scaled-down version of the Project for the mandated No Project Alternative, thus failing to analyze the No Project Alternative, and thereby precluding the public and decision makers from comparing the effects of the Project with those of not proceeding with the Project.

For this, and the reasons detailed in our previously submitted comments and attachments, the County should concur with its Staff Findings and deny this Project. Alternatively, the County must reject this FEIR, revise its flawed analyses and recirculate it for public comment under the procedures for a programmatic level EIR.

Sincerely,

/s/

Roger Lin
Staff Attorney